



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 30, 2018

By ECF

The Honorable Edgardo Ramos
United States District Judge, S.D.N.Y.
40 Foley Square
New York, New York 10007

Re: United States v. Paul Dean, Robert Espinel, and Gaetano Valastro
17 Cr. 398 (ER)

Dear Judge Ramos:

The Government writes on behalf of all parties to respectfully request that the conference currently scheduled for June 1, 2018 be adjourned for a period of approximately six weeks, until July 12 or thereafter, in order to allow the defendants additional time to review discovery and to allow the parties to continue to discuss the potential for a pretrial disposition of this matter. We would propose July 12, 2018 or thereafter as an alternative date for the next pretrial conference.

Accordingly, with the consent of defense counsel, the Government further respectfully requests that time be excluded under the Speedy Trial Act until July 12, 2018 or the alternative date thereafter set by the Court pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The Government submits that the exclusion of time best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial as it will enable the defense additional time to review discovery and allow the parties to continue discussions regarding the potential disposition of this matter.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: Counsel for all defendants